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February 3, 2006

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc., Inc.  
236 Massachusetts Avenue, N.E. Suite 110  
Washington, DC 20002

**RECEIVED**

**FEB - 3 2006**

Federal Communications Commission  
Office of Secretary

**Re: Certification of CPNI  
EB Docket No. 06-36  
EB-06-TC-060**

**CPNI Compliance Certification for**

**GTA Telecom, LLC 499 Filer ID No.  
Pulse Mobile LLC 499 Filer ID No.  
GTA Services LLC 499 Filer ID No.**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

**Attachment**

**Copies: 4 additional copies to Secretary  
Byron McCoy, Telecommunications Consumers Division  
Best Copy and Printing (BCPI)**

No. of Copies rec'd 0 + 4  
List ABCDE

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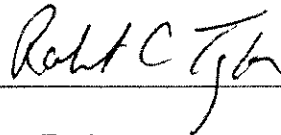
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GTA Telecom, LLC  
Pulse Mobile LLC  
GTA Services LLC

624 North Marine Corp Drive, Tamuning, Guam 96913 (671) 644-0000

## CERTIFICATION

I am Robert Taylor, Chief Executive Office of GTA Telecom, LLC. On behalf of GTA Telecom, LLC and its affiliates listed above (collectively the "Company"). I hereby certify that I have personal knowledge that the Company is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.<sup>1</sup> Accompanying this certificate is a statement explaining how the Company is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Robert Taylor  
Chief Executive Officer  
GTA Telecom, LLC  
February 3, 2006

Attachment

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<sup>1</sup> 47 C.F.R. §§ 64.2001-2009.

**GTA Telecom, LLC  
Pulse Mobile LLC  
GTA Services LLC**

**624 North Marine Corp Drive Tamuning, Guam 96913 (671) 644-0000**

**STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how the companies listed above (collectively the "Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.*

**1. Identification of CPNI**

The Company has informed employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

**2. Customer Notification and Authorization Process**

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the Section 64.2007(f)(2).

**3. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

**4. Record Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

**5. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.